



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

OFFICE OF
COMPLIANCE AND ENFORCEMENT

JAN 31 2018

Reply To: OCE-101

CERTIFIED MAIL — RETURN RECEIPT REQUESTED

Mr. Richard K. Watson
Stepping Stone Builders, Inc.
P.O. Box 82724
Fairbanks, Alaska 99708

Re: Reclassification of One Motor Vehicle Waste Disposal Well at Stepping Stone Builders, Inc.,
3490 Koba Way, Fairbanks, Alaska 99708
UIC ID No. AK090P5-17-13753
CAFO Docket No. SDWA-10-2017-0111

Dear Mr. Watson:

On May 12, 2017, the U.S. Environmental Protection Agency (EPA), Region 10 Underground Injection Control (UIC) Program, received your closure plan for one Class V injection well at 3490 Koba Way pursuant to section 4.20 of Consent Agreement and Final Order (CAFO) SDWA-10-2017-0111. The submittal included a copy of the Class V Well Pre-Closure Notification Form dated May 8, 2017, a Wastewater Plan Approval dated December 3, 2015, by Goldstream Engineering and a Work Plan, dated May 11, 2017, by Fairbanks Water and Wastewater consulting. The EPA reviewed the closure plan submittals and sent comments requesting additional information on May 26, 2017. EPA sent additional comments and received additional information from Stepping Stone Builders, Inc. (Stepping Stone) on May 26 and 31, 2017. EPA sent a Work Plan approval letter on July 6, 2017. On September 15, 2017 EPA received a Class V injection well reclassification request that included injection well soil and water test analysis results. The EPA sent comments to Stepping Stone throughout November and December 2017 and has received enough information from Stepping Stone to allow EPA to review the well closure.

The information provided to the EPA about the closure of the motor vehicle waste disposal well is summarized as follows:

Injection Well Description

Stepping Stone built and leases a six bay facility at 3490 Koba Way, Fairbanks, Alaska (Facility). At the time of the EPA inspection on September 15, 2016, three of the bays were rented to businesses which perform motor vehicle maintenance or repair within the bays. The injection well consisted of a 4-inch pipe installed below the six rental bays which collected fluids from floor drains located in each bay and conveyed the fluid to the oil/water separator and out to the septic tank. Fluid is conveyed from the septic tank to perforated pipe which drains to a drainfield.

Summary of Closure Activities

The closure of the motor vehicle waste disposal well (MVWDW) consisted of disconnecting the 4-inch pipe located after the oil/water separator and before the septic tank. The line outside the building where the oil/water separator ties into the sewer line was cut and permanently capped in August. Each floor drain has a temporary cap installed as the respondent noted the interest in connecting to the sanitary sewer in the spring. Following the cutting and the capping of floor drain line, the oil water separator was pumped.

Sampling

Sample Locations. The location of all three samples was taken below a single point in the distribution (leach) field. Soil Sample, Sample 1: This split-spoon sample was taken at between 4' and 5' below original grade, between 1' and 2' below the leach rock in the distribution system. Soil Sample, Sample 2: This Split-Spoon sample was taken at between 6' and 7' below original grade, between 1' and 2' above the static water elevation. Groundwater Sample, Sample 3: This sample was taken from between 9' and 10' below grade, between 1' and 2' below the static groundwater elevation.

Testing was conducted by Pollen Environmental, LLC using the most current EPA-approved methods for volatile organic compounds, semi-volatile organic compounds, arsenic, cadmium, chromium and lead. The samples were also tested for gasoline range organics, and diesel range organics were analyzed using Alaska Department of Environmental Conservation (ADEC) approved methods.

Results of the soil analyses were observed to be below State and Federal clean-up levels. Concentrations of arsenic, lead and naphthalene were detected slightly above clean-up levels in the groundwater, which, according to an ADEC representative, is consistent with other groundwater testing within the area.

Approval

The closure report specifies that Stepping Stone intends to continue to discharge only sanitary waste to the septic system and includes information indicating that the shop floor drains were permanently closed so they no longer discharge to the injection well.

Pursuant to the EPA's authorities under 40 CFR §§ 144 and 146, the EPA approves the reclassification of this Class V injection well. The UIC program file for this facility has been updated to show that one MVWDW Class V injection well has been reclassified to a septic-only injection well. Stepping Stone is responsible for meeting all applicable UIC requirements under the Safe Drinking Water Act. If additional information becomes available indicating that the injection well conversion activities at this facility are inadequate, Stepping Stone is required to provide the additional information to the EPA and further efforts may be required in the future. You are also advised that Stepping Stone is responsible for compliance with all other federal, state or local laws and regulations including all applicable state wastewater disposal requirements under 18 AAC 72.

If you have any questions, please contact Donna Ortiz of my staff at (206) 553-2429.

Sincerely,



Peter Contreras, Manager
Ground Water Unit

cc: Mr. Sterling DeWilde
Fairbanks Water & Wastewater Consulting

Ms. Tonya Bear
Alaska Department of Conservation